

EXHIBIT B

Direct Testimony of
Bridget Terry Long, Ph. D.

SFFA v. UNC et al., Case No. 14-cv-954 (MDNC)

November 18, 2020

Bridget Terry Long, Ph. D.



Harvard Graduate School of Education
Dean of the Faculty of Education
Saris Professor of Education and Economics
Academic Dean (2013-2017)
Faculty Director (2010-2013)
Chair



National Board for Education Sciences
U.S. Department of Education
Research Associate
National Bureau of Economic Research

Member
National Academy of Education
Board Member
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EDUCATION
Ph.D., Economics
Harvard University (2000)
M.A., Economics
Harvard University (1997)
A.B., Economics
Princeton University (1995)



Questions Posed

- ▶ Asked to survey the universe of race-neutral alternatives that have been implemented by other universities, hypothesized in academic literature, and mentioned in the Complaint
- ▶ Based on that survey, opined as to whether some of these potential race-neutral alternatives should be considered by the University and important factors to keep in mind, such as contextual influences
- ▶ Asked to review and respond to some of the opinions on race-neutral alternatives offered by Richard Kahlenberg

Questions Not Posed

- ▶ The evaluation of race-neutral simulations at the University
- ▶ Whether the University should implement a specific race-neutral approach
- ▶ The role of race / ethnicity within the University's admissions process

Opinions Reached



Based upon my survey of race-neutral alternatives that have been implemented by other universities or hypothesized in academic literature, I opined on those results, including highlighting key factors related to the quality of the evidence and feasibility of specific RNAs.

Based on this review, I identified those RNAs that I believe make sense for the University to consider evaluating, along with factors to keep in mind

Mr. Kahlenberg makes a number of overstatements about RNAs and the potential success of those alternatives at the University

Key Factors in Assessing RNAs

- ▶ The quality and relevance of the evidence
 - What is the quality of the data used to assess the impact of an RNA, including how comprehensive and detailed are the measures used in the assessment?
 - Does the study characterize a feasible admissions process?
 - Does the study consider not only the short-term but also the long-term consequences of a change in admissions policy, including potential impacts on applicant behavior and other indirect influences on the applicant pool?
- ▶ The role of context and institutional characteristics in influencing the impact of RNAs
 - What is the context of the institution featured in the study?
 - What are the characteristics of institution studied?

Conclusions From Assessing Potential RNAs

- 1) Whether studying the effects of a policy put in place or a hypothetical simulation of a potential policy, the impact of any race-neutral approach is dependent upon the specific institutional characteristics and demographic makeup of the context.
- 2) Whether a proxy for race can be used to achieve racial diversity will be determined largely by how correlated race is to the alternative measure.
- 3) Efforts by selective universities to implement various RNAs have not been successful in accomplishing their intended goals.
- 4) Many RNAs hypothesized in the academic literature are not feasible or would be incredibly difficult for institutions to implement in reality.

Opinions Reached

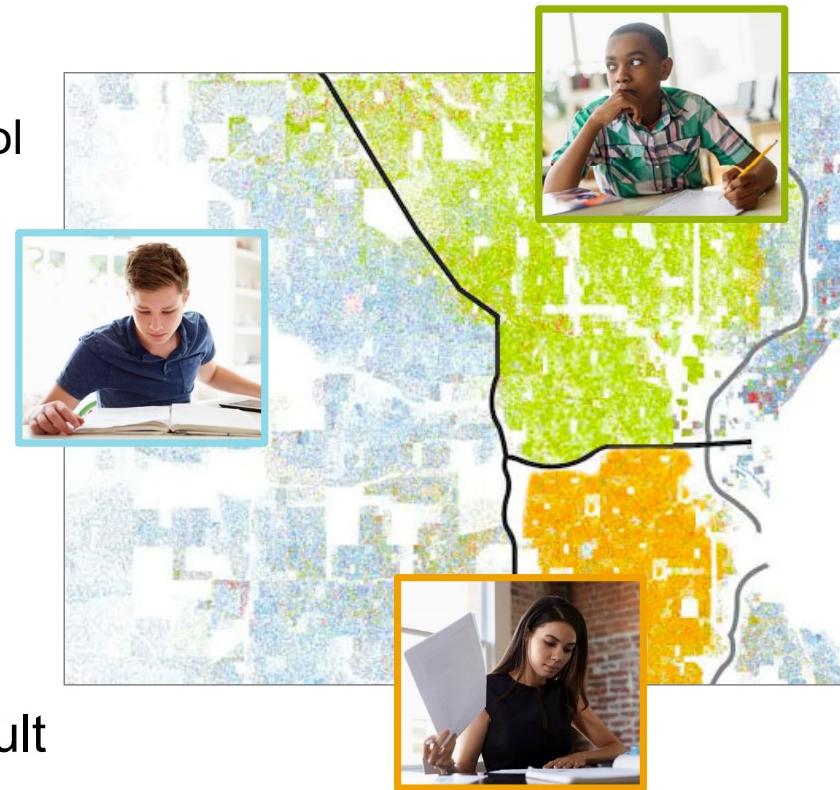
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The Success of Place-Based RNAs Requires Underlying Segregation

- ▶ Place-based approaches:
 - Percentage plans, based on high school class rank (e.g., Texas)
 - Geography-based admissions plans have not been attempted but would provide preferences based on the residence (e.g., zip code)
- ▶ There must be high levels of segregation across high schools (i.e., schools that are nearly all one race or ethnicity) for this policy to result in admitting a diverse student body



Institutions That Have Implemented Percentage Plans Have Had Limited Success

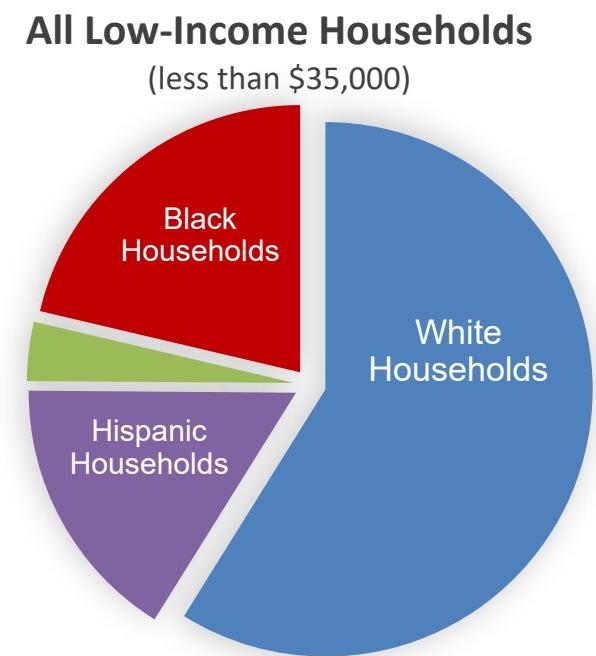
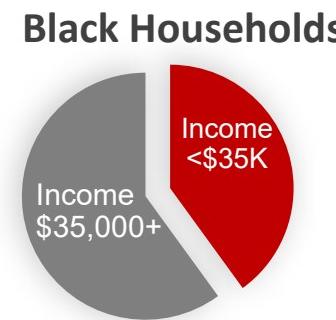
- ▶ Universities that have implemented percentage plans have struggled to maintain racial and ethnic diversity.
- ▶ Institutions that have implemented percentage plans have also expressed concerns about the fact that the approach limits the ability of admissions committees to take into account academic preparation and rigor in their decisions.
- ▶ Percentage plans can have indirect effects on other important behaviors, which can ultimately influence whether universities are able to accomplish their goals.

Geography-Based Plans Are Hypothetical

- ▶ This potential RNA is entirely hypothetical, and the related research does not provide quantitative evidence on the potential impact of this approach on racial and ethnic diversity.
- ▶ Like Percentage Plans based on high school class rank, there must be high levels of underlying segregation for this plan to result in diverse admissions pools.
- ▶ The problem of families acting strategically to alter outcomes would likely be even worse under a geographic or zip-code plan than for Percentage Plans.
- ▶ This plan would also force admissions committees to disregard valuable information on academic preparation and rigor, which could vary even more by zip code than by high school.

Socioeconomic Status (“SES”) Plans

- ▶ Like place-based RNAs, the effects of an SES Plan will depend upon the strength of the relationship between race and the measure of SES used.
- ▶ Although many Black and Latino students are from low-income families, most poor families are White.
- ▶ Therefore, simulations have shown that SES Plans would favor more White students than racial/ethnic minorities.



Source: Income and Poverty in the United States 2019. Table A-2. Households by Total Money Income, Race, and Hispanic Origin of Householder: 1967 to 2019.

SES Plans Are Hypothetical and Infeasible to Implement

- ▶ No undergraduate institution has implemented a SES-based admissions policy to replace a holistic, race-conscious approach.
- ▶ Research on hypothesized SES plans provide limited insight on what might be possible because they are not feasible:
 - The hypothesized plans require data that is not available or practical for an admission committee to use.
 - Simulations in the research literature use assumptions that are not reasonable / appropriate in the real world.

Opinions Reached

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Based on this review, I identified those RNAs that I believe make sense for the University to consider evaluating, along with factors to keep in mind



Mr. Kahlenberg makes a number of overstatements about RNAs and the potential success of those alternatives at the University.

Overview of Critiques of Kahlenberg's Conclusions

- 1) He overstates how effective RNAs have been (and would be) because:
 - a) He fails to account for the quality and relevance of the research.
 - b) He ignores the broader context of universities that have implemented RNAs.
- 2) Kahlenberg's approach could not be implemented because his definition of SES requires information that is not available to admissions offices

Kahlenberg Fails to Account for the Quality and Relevance of the Research

More Rigorous Studies

M. Long and Tienda (2008)

- **Institutional Data:** Administrative data from three Texas universities several years pre- and post-policy change
- **Indirect Effects:** Considers how behavior changed and whether RNAs helped to maintain diversity levels

Bowen, Kurzweil, and Tobin (2005)

- **Detailed Data:** Includes 18 selective institutions (3 public)
- **Multiple Simulations:** Investigates effect of income-sensitive admissions preferences while removing consideration of race

Reardon, et. al. (2015)

- **Comprehensive, Feasible Data:** Multiple years of data focusing on information available to admissions committees
- **Dynamic Model:** Considers what would happen if multiple universities changed practice
- **Indirect Effects:** Accounts for applicants changing their behavior over time

Less Rigorous Studies

Carnevale, et. al. (2014)

- **Unrealistic Assumptions:** Applicants apply to all 193 most selective colleges in U.S., and then colleges rank the enlarged pool and fill entering class from top of list down
- **Limited Data:** Does not use actual institutional data

Gaertner (2014)

- **Limited Data:** Analysis of a subset of one year of applicants to one institution (CU-Boulder) during an unusual year (2009)
- **SES Measure not Feasible:** Uses an index constructed by relying on an external dataset (the authors admit this is not what admissions committees ordinarily have access to)
- **Dissimilar Context:** CU-Boulder is much less selective than UNC-CH (77% acceptance rate) and different state makeup

Kahlenberg and Potter (2012)

- **Dissimilar context and institutional characteristics**
(See the next slide.)

Kahlenberg Ignores the Broader Context of Universities That Have Implemented RNAs

Institution	Acceptance Rate	Presented by Kahlenberg as "Successful"
Univ. of Arizona	79%	Yes
Univ. of Nebraska-Lincoln	75%	Yes
Univ. of Georgia	54%	Yes
Univ. of Florida	46%	Yes
Univ. of Washington	45% (59% in-state / 42% out-of-state)	Yes
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Univ. of Michigan	29% (42% in-state / 25% out-of-state)	No
Univ. of NC-Chapel Hill	27% (46% in-state / 14% out-of-state)	?
UCLA	18%	No
UC-Berkeley	17%	No

Kahlenberg's Approach to SES Plans Is Unlikely to Work and Would Not Be Feasible

- ▶ Using wealth or income information in admissions decisions would constitute a fundamental change to admissions practices and violate the objective of being need-blind.
- ▶ Kahlenberg's approach relies on a broad definition of SES that requires information on family wealth that is not available to admissions offices and so could not be implemented:
 - Income does not equal wealth.
 - Reliable wealth information is not available for many applicants.

Kahlenberg Advocates For an SES Definition That Relies Upon Data Not Available To Admissions Offices

- ▶ Kahlenberg incorrectly suggests that universities could use the Free Application for Federal Student Aid (FAFSA) to get information about wealth
- ▶ The FAFSA would tell institutions little about an applicant's SES:
 - The FAFSA is not completed by all students.
 - Students with incomes below \$50,000 do not complete the wealth questions.
 - The wealth questions exclude home value, which means they leave out the greatest source of assets for most American families.
 - Families report limited amounts of data.